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Senator Tom Casperson, Chair  
Senate Natural Resources, Environment and Great Lakes Committee  
Lansing, Michigan 48909

Dear Senator Casperson and Committee Members:

I first want to thank the Committee for providing the opportunity to comment on the DNR's Living Legacies/Biodiversity Stewardship Program. It is a program which I believe is critical to preserving some of Michigan's most important and most threatened Natural Resources. Natural Resources are one of the key attributes and tourist attractions of the State and this program recognizes their importance and fragility. The program is important to all of Michigan, but I want to stress that it is particularly important to Beaver Island where I live. Islands like Beaver Island are isolated and refuges for biological diversity and for many endemic species. Beaver Island was identified in the original Biodiversity Stewardship Area and also in the recent publication, "Islands of Life, A biodiversity and Conservation Atlas of the Great Lakes Islands," by the Nature Conservancy. I hope you will continue the BSA program and include Beaver Island as a BSA.

A year ago, I wrote the DNRE to express my dismay that Beaver Island's interior was deleted from inclusion as a Biodiversity Stewardship Area and to request that the interior of Beaver Island be included as a Biodiversity Stewardship Area as recommended by the Core Design Team and by the DNR's regional office. The DNRE's report indicated that Beaver Island's interior was deleted because the BSA designation was inconsistent with the designation of an Experimental Game Management Area (also called game research area). This change was made without consultation with the Island and without documentation. I would first like to discuss the "Experimental Game Management Area" issue raised at the time and then indicate the many good reasons why the Island should be a Biodiversity Stewardship Area.

The Experimental Game Management Area designation is one established by statute, MCL324.41103. According to a letter I received from Rodney Stokes dated February 16, 2011, this designation should not be an issue in granting BSA because the designation of a BSA and an experimental game area are not competitive concepts. He stated, "in the case of Beaver Island, BSA designation was intended to ensure that certain communities are conserved while game management is being conducted." Thus, the original stated reason for deleting Beaver Island's interior is not valid according to the Director. In fact, the BSA designation DNRE materials specifically state that land uses that promote or do not impact or detract from conservation are acceptable and that most historical or existing land uses that are already in place will continue. Hunting, mining and logging can still continue.

## **REASONS ALL OF BEAVER ISLAND SHOULD BE INCLUDED AS A BIODIVERSITY STEWARDSHIP AREA**

**1. Beaver Island's biodiversity is well-documented, as shown in the following scientific reports by experts:**

**A. The 2010 report "Islands of Life: A Biodiversity and Conservation Atlas of the Great Lakes Islands"** prepared by the Nature Conservancy of Canada with support from the Collaborative for the Conservation of Great Lakes Islands including the University of Minnesota, the Nature Conservancy, the Nature Conservancy of Canada, the U.S. Fish and Wildlife Service, and the Great Lakes Islands Project. The report states:

- "The highest scoring islands for biodiversity in Lake Michigan include Beaver Island, Garden Island and Hog Island."
- "Key Islands for Biodiversity Conservation: Beaver Island, Washington Island, Garden Island, and Hog Island." Table 5.
- "Table 6. Top 10 most threatened islands: . . . 10. Beaver Island."
- Beaver Island has occurrences of 13 rare species, including the globally rare Piping Plover, Lake Huron Locust, Pitcher's Thistle and Dwarf Lake Iris, as well as five rare plant communities. This Island has occurrences of seasonal fish spawning of Lake Whitefish, Lake Trout, Rock Bass, Smallmouth Bass and Yellow Perch.

**B. The 2004 report "Biological Ranking Criteria for Conservation of Islands in the Laurentian Great Lakes,"** prepared by 5 Nature Conservancy Offices under contract with the U.S. Fish and Wildlife Service. The report states;

- Biodiversity values of islands are clearly distinguished from each other with this ranking system. The Beaver Island archipelago was identified as conservation sites in the Blueprint and scored highly with the island ranking system. In addition other islands not explicitly identified as conservation sites (e.g. Hog Island in Lake Michigan) ranked highly.
- Table III-1. Beaver Island had the highest score of all Northern Lake Michigan Islands for Biodiversity. Of all the 33,000 Great Lakes Islands, it ranked second in Biodiversity.

**C. The 1999 Report "Biological Inventory for Conservation of Great Lakes Islands: 1998 Progress Report"**

- Prepared by the Michigan Natural Features Inventory for the Michigan Coastal Management Program Land and Water Division. The study identified State threatened species:
- the Lake Huron Locust, the red-legged spittlebug, a species of special concern in Michigan.
- 62 Bird species (29 long distance migrants, 23 short distance migrants, 10 winter residents. "Beaver Island and Garden islands provide important stopover habitats for spring migratory birds. The black throated blue warbler is on the watch list that warrants conservation attention, the state threatened merlin, common loon and bald eagle and Caspian tern are all found on the Island. (Note: the DNRE has since identified 109 bird species including the State Featured Species of Red-headed and pileated woodpeckers.
- Rare plant species include: Pitcher's thistle, Lake Huron tansy, dwarf lake iris, Michigan monkey-flower, butterwort and water shore-grass, English sundew, tway blade orchids, and Pupil's brome grass.
- New natural community occurrences of open dunes, northern fen, boreal forest and mesic northern forest. These rare plant communities were found in 17 locations on Beaver Island.
- "The high quality of mesic northern forest discovered in this study, particularly on Beaver Island, are of significant conservation importance to Michigan"

**2. The findings of the DNRE Core Design Team support inclusion of the entire Island as recommended:**

The report points out a very high-quality complex of many large and small patch natural communities. These exist on the shoreline as shown in the report but also include interior high quality Dry-Mesic Forest, Boreal Forest, Northern Wet Meadow, and Poor Fen. "The natural communities have good natural function due to the remoteness of the islands. The report concludes "This area includes all or significant portions of a large number of previous designations, including two areas nominated for legal protection under the wilderness and Natural Areas statute, tow areas designated as natural areas though other means, four Critical Dunes areas, three areas designated as critical habitat for the endangered Piping Plover, seven Coast Environmental Areas, thirteen Ecological Reference Areas, and three Potential Old Growth areas. It also supports a large number of rare plant and animal populations and a Great Blue Heron rookery."

**3. Islands are of particular importance in climate change and biological legacy.**

The 2007 report: Great Lakes Islands: Biodiversity Elements and Threats, A final Report to the Great Lakes National Program Office of the Environmental Protection Agency. "The net result is a rich biological legacy that includes colonial nesting water birds, species and communities endemic to the Great Lakes region, critical stopover sites for migratory birds, rich reptile faunas, and important fish spawning and nursery areas. Consequently, protection of islands to conserve native species and communities is of particular importance."

**4. The designation is consistent with the State of Michigan's Natural Resources and Environmental Protection Act (Act 451 of 1994).**

Part 355. "It is the goal of this state to encourage the lasting conservation of biological diversity."

Part 525: "The department shall conserve and protect forestland by contributing, 'to the conservation of biological diversity by developing and implementing stand and landscape-level measures that promote habitat diversity and the conservation of forest plants and animals including aquatic flora and fauna and unique ecosystems.

"The Department shall adopt a forestry development, conservation, and recreation management plan for state owned lands owned or controlled by the department that includes, "A landscape management plan for the state forest incorporating biodiversity conservation goals, indicators, and measures."

**5. The removal of the interior of Beaver Island is inconsistent with the stated goals of the DNRE for a BSA. There is no documented justification for removing the interior of Beaver Island from the BSA.**

The original recommendation for the Beaver Island Archipelago was creating a Biodiversity Stewardship Area of 43, 629 acres. The modification reduced the BSA upon Beaver Island to focus only on the shoreline communities. "Interior areas were removed due to the incompatible dedication of these areas for game management research." The remaining acres are 18,455 (largely the rest of the Archipelago) This action is inconsistent with the state goal of the Living Legacies Initiative " The goal of the Living Legacies initiative is to establish a statewide network of places that together best represent the diversity of our state's biological heritage (biodiversity) and that represent strong opportunities for long-term conservation of the ecosystems that sustain Michigan's biological heritage." Beaver Island meets the four criteria set forth in the DNRE's publication, "Living Legacies: Managing Michigan's Diverse Natural Places."

- **Functionality**—Beaver Island's high rankings for biodiversity in the scientific reports and the high quality wetlands, mesic forests and boreal forests and the presence of threatened and endangered species show that the pieces of the ecosystem continue to exist. The threats noted in the Island's of Life report indicate that now is the time to recognize and work on the ecosystems parts, seeing that they continue to thrive.

- **Quality and Condition**—As pointed out in the scientific inventories of the Island, Beaver Island is home to rare and threatened plant species, bird species, two insects, and high quality mesic and boreal forests. Simply including only the shoreline in the BSA will not conserve these species.
- **Social and Economic values**—Beaver Island values conservation as evidenced by the creation of the two townships of a joint commission to preserve and protect our natural resources, the Beaver Island Natural Resources/Ecotourism Steering Committee.
- **Ecosystem Representation.** Beaver Island's inclusion is an important representation as it is the highest quality biodiversity Island in Lake Michigan and the second ranked in the Laurentian Lakes. Further as pointed out in the report on Great Lakes Islands to the EPA, islands are extremely important to climate change and to the conservation of native species and migratory birds.

**6. BSA designation is extremely advantageous and important to the Island.**

- **Our biodiversity and unique natural features are the bread and butter of the island. People come to the Island to live and to build summer homes because of its Natural Features and Beauty.**
- **The isolation of the Island represents a strong opportunity for long-term conservation of its ecosystem.**
- **The Island is engaged in the planning process for our natural resources on the Island, working with the DNR on a biodiversity planning process will enrich our plan and our Island.**
- **The biodiversity status will assist the Island in increasing the Island's status for bird watchers, conservationists, and scientific researchers and will allow diverse stakeholders to be heard to create meaningful conservation efforts. It will also help make the Island a priority for funding.**
- **In December of 2010, numerous letters were sent by Island residents and property owners to the DNRE in support of the BSA designation. Scientific organizations knowledgeable about the Island also sent their letters of support.**

Thank you for your time and consideration of my request. If you have questions, you may contact me at 231-448-2982. I did not find out about the public meeting scheduled for Monday until late this week and am unable to attend.

Sincerely,

**Sandra Birdsall**